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IDAHO PUBLIC
UTILITIES COMMISSION

Stephanie Boyett-Colgan
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IDAHO TELEPHONE ASSOCIATION,
CITIZENS TELECOMMUNICATIONS
COMPANY OF IDAHO, CENTURYTEL OF
IDAHO, CENTURYTEL OF THE GEM
STATE, POTLATCH TELEPHONE
COMPANY and ILLUMINET, INC.

Complainants

QWEST CORPORATION¹,

Respondent.

CASE NO QWE-T-02-11

MOTION TO CONTINUE HEARING

Qwest Corporation (Qwest), by and through its attorneys of record, moves this Commission for an order continuing the hearing of this matter for a period of not less than thirty days to such time as the Commission and the parties find convenient for rescheduling of the hearing.

This continuance is being sought to allow Qwest the opportunity to conduct discovery, and to prepare and file testimony in response the Direct Testimony of Charles H. Creason²

¹ The Complaint names Qwest Communications, Inc. as the Respondent, but the proper party is Qwest Corporation.

² Under this Commission's Procedural Order No. 29097, direct testimony has to have been filed September 27, 2002.

received by Qwest on October 21³. This filing on behalf of the Idaho Telephone Association (ITA) requires additional time to respond because Mr. Creason was not previously identified as a witness and ITA stated in response to a Qwest interrogatory that its members use “Syringa Networks LLC” to provide signaling system seven (“SS7”) to the ITA members’ end users when Mr. Creason’s testimony appears to rely upon a contract with a previously unidentified entity, “System Seven,” as the basis for the provision of SS7 to ITA member customers. Qwest intends to present evidence that contradicts Mr. Creason’s testimony in certain important respects.

Qwest further submits that Mr. Creason’s testimony points to a basic flaw in the way that this case is being presented by Complainants that should be corrected before this case is heard by the Commission. According to interrogatory responses provided by ITA to Qwest, only two ITA members are served⁴ by Illuminet, while only one is served by Qwest. All other ITA members are served by either System Seven or Syringa Networks LLC. These entities have not been named as parties to this case nor has their relationship to the issues been clearly spelled out for the Commission. Nevertheless, the preexisting arrangements between Qwest and the independent local exchange carriers (ILECs) and the alleged impact on ILEC customers is a key part of the argument the Complainants present to this Commission in their testimony.

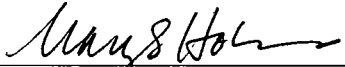
Qwest believes that the additional time requested herein will, at a minimum, allow Qwest and the other parties to this case to clarify the issues for presentation to the Commission. In addition, Qwest is hopeful that it will facilitate narrowing of the issues and the possibility of settlement. Furthermore, Qwest submits that no party will be prejudiced by this continuance since the disputed charges are not being paid by any Illuminet, or any other party to this case pending its outcome.

³ Service of this testimony was by mail, Qwest is not aware when it was filed with the Commission.

⁴ In this context being served by another entity means that the exchange carrier obtains SS7 signaling through that entity.

Qwest's undersigned counsel states that she has contacted the attorneys for the parties herein and that counsel for the ITA, Conley Ward, has indicated that ITA will not support this Motion. The undersigned further states that although she has left messages for Mr. Richards who represents Citizens and ELI and Mr. Moorman, who represents Illuminet, Inc., these messages have not been returned.

Respectfully submitted this 30th day of October, 2002.



Mary S. Hobson
Stephanie Boyett-Colgan

Attorneys for Qwest Corporation